ELECTRONICALLY RECEIVED - 8/5/2024 4:39 PM - Crystal D'Amico, DEPUTY James R. Hawkins (SBN 192925) 1 Christina M. Lucio (SBN 253677) SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDINO SAN BERNARDINO DISTRICT Mitchell J. Murray (SBN 285691) 2 JAMES HAWKINS APLC 3 9880 Research Drive. Suite 200 Irvine, California 92618 Telephone: (949) 387-7200 Facsimile: (949) 387-6676 AUG 07 2024 4 5 James@Jameshawkinsaplc.com Christina@Jameshawkinsaplc.com ANTHONY MARTINEZ 6 Attornevs for Plaintiffs 7 8 Norman B. Blumenthal, Bar No. 068687 Kyle R. Nordrehaug, Bar No. 205975 Aparajit Bhowmik, Bar No. 248066 9 Nicholas J. De Blouw, Bar No. 280922 BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP 10 2255 Calle Clara La Jolla, CA 92037 11 Telephone: (858) 551-1223 Fax: (858) 551-1232 12 13 Attorneys for Plaintiffs [Additional Counsel on the Following Page] 14 SUPERIOR COURT OF THE STATE OF CALIFORNIA 15 **COUNTY OF SAN BERNARDINO** 16 17 Judicial Council Coordination Proceeding Case Coordination Proceeding Special Title 18 No.: JCCP 5259 (Rule 3.550) 19 TARGET WAGE AND HOUR CASES Assigned for All Purposes To: Hon. Wilfred J. Schneider, Jr. 20 Dept.: S-32 **Included Actions:** 21 STIPULATION AND [PROPOSED] ORDER TO CONTINUE FINAL APPROVAL Medina et al. v. Target Corporation 22 **HEARING** San Bernardino Superior Court, Case No. CIVSB2209126 23 24 Torres v. Target Corporation Sacramento Superior Court, Case No. 34-2022-00319715 Complaint Filed: September 22, 2022 25 Trial Date: None Yet Set 26 27

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	Page 2		
	STIPULATION AND [PROPOSED] ORDER TO CONTINUE FINAL APPROVAL HEARING		

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STIPULATION TO CONTINUE FINAL APPROVAL HEARING

Plaintiffs Gustavo Medina, Janira Perez, Sergio Garcia, Alicia Torres, Zachary Lomely, Angel Carter, Denise Cardena, Brian Mena, Jimmy Perez, Emily Porcho, Sheemal Narayan, Juan Morales, Joaldi Gonzalez and Martha Franco (collectively, "Plaintiffs") and Defendant Target Corporation ("Defendant" or "Target"), by and through their counsel of record, hereby stipulate to continue the hearing regarding Plaintiffs' anticipated motion for final approval of the Parties' settlement to December 5, 2024, for the following reasons:

WHEREAS, the Parties have reached a settlement of this case;

WHEREAS, the Court granted Plaintiffs' motion for preliminary approval of the Parties' settlement on July 22, 2024, and scheduled the final approval hearing for November 14, 2024;

WHEREAS, pursuant to Code of Civil Procedure section 1005(d), all noticed motions must be filed at least 16 court days prior to the hearing date;

WHEREAS, 16 court days prior to the November 14, 2024, final approval hearing would be October 22, 2022;

WHEREAS, the deadline for putative class members to object to or opt out of the settlement is expected to be October 28, 2024; and

WHEREAS, Plaintiffs cannot move for final approval of the settlement until after the deadline to object or opt out has lapsed because Plaintiffs must inform the Court of the number of putative class members who have either objected or opted out;

THEREFORE, the Parties agree that the Court should reschedule the final approval hearing to December 5, 2024 (or as soon thereafter as the Court can conduct the hearing), so that Plaintiffs can provide a full report regarding the feedback from the putative class members about the settlement.

IT IS SO STIPULATED.

1 2	Dated: August 5, 2024	JAMES HAWKINS APLC
3		By: /s/ Christina Lucio
4		By:
		Mitchell Murray
5		Attorney for Plaintiffs
6 7	Dated: August 5, 2024	BLUMENTHAL NORDREHAUG BHOWMIK
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8		By: /s/Kyle R Nordrehaug
9		By: /s/ Kyle R. Nordrehaug Kyle R. Nordrehaug
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12	Dated: August 5, 2024	
13		HAINES LAW GROUP, APC
14		By: /s/ Matthew K. Moen Paul K. Haines
15		Fletcher W. Schmidt
16		Matthew K. Moen
17	,	Attorney for Plaintiffs
18	Dated: August 5, 2024	
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20)	By: Ments. M.
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	STIPULATION AND [PROPOSE	D] ORDER TO CONTINUE FINAL APPROVAL HEARING

PROPOSED ORDER

Having considered the parties' stipulation to continue the date of the hearing of Plaintiffs' motion for final approval of the settlement in this case, the Court hereby orders that the hearing be continued from November 14, 2024, to December 5, 2024, 8-3 6 Company.

IT IS SO ORDERED.

DATED: 8/7/2024

HON. WILFRED J. SCHNEIDER, JR. JUDGE OF THE SUPERIOR COURT

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